

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Eric Forsythe, Individually And On Behalf Of All Others Similarly Situated,)	
)	
)	
Plaintiff,)	
)	Civil Action No. 04cv10584 (NG)
vs.)	
)	
Sun Life Financial Inc., et al.,)	
)	
Defendants.)	
)	
Larry R. Eddings, Individually And On Behalf Of All Others Similarly Situated,)	
)	
)	
Plaintiff,)	
)	Civil Action No. 04cv10764 (NG)
vs.)	
)	
Sun Life Financial Inc., et al.,)	
)	
Defendants.)	
)	

MOTION FOR CONSOLIDATION

Plaintiffs Eric Forsythe and Larry R. Eddings (“Plaintiffs”), by their counsel, hereby move this Court for entry of an Order (attached hereto): (i) consolidating the above-captioned actions (the “Actions”); and (ii) establishing a briefing schedule. In support of this Motion, Plaintiffs submit herewith a Memorandum of Law, a Declaration, and [Proposed] Pretrial Order No. 1 For Consolidation.

Dated: May 14, 2004

Respectfully submitted,

MOULTON & GANS, P.C.

By: /s/ Nancy Freeman Gans

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LOCAL RULE 7.1 CERTIFICATE

I, Nancy Freeman Gans, counsel for plaintiffs Eric Forsythe and Larry R. Eddings, hereby certify that I spoke with John J. Falvey, Jr. of Testa, Hurwitz & Thibault and James C. Rehnquist of Goodwin Proctor LLP, regarding the Motion For Consolidation. Furthermore, I certify that Daniel P. Dietrich, counsel for plaintiff Eric Forsythe, spoke with Amanda Masselam of Hale & Dorr LLP, who stated that she has spoken to George J. Skelly of Nixon Peabody LLP, regarding the Motion to Consolidate. All defense counsel that we have spoken with have indicated that they do not oppose consolidation, but they do oppose the name used in the caption of the consolidated cases. I have left messages for John D. Donovan of Ropes & Gray LLP, but have not been able to confer with him regarding the Motion For Consolidation.

Dated: May 14, 2004

/s/ Nancy Freeman Gans
Nancy Freeman Gans

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party by first class mail, postage prepaid, on May 14, 2004.

/s/ Nancy Freeman Gans
Nancy Freeman Gans